

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN OPPOSITION OF COMMSCOPE'S
MOTION TO STRIKE PORTIONS OF THE NON-INFRINGEMENT REPORT AND
OPINIONS OF DEFENDANTS' EXPERT, DR. NAOFAL AL-DHAHIR**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit E** is a true and correct copy of excerpts from the Expert Report of Arthur Brody, Ph.D., on Infringement of Family 1 and 10 Patents by CommScope, served on November 18, 2022.

3. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the December 5, 2022 Deposition Transcript of Dr. Naofal Al-Dhahir.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong